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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE )  
COMMISSION, )  
 )  
Plaintiff, )  
 )  
vs. ) CASE NO.:  
 ) 22-cv-3421-DG-ST  
A.G. MORGAN FINANCIAL ADVISORS, )  
LLC, VINCENT J. CAMARDA, and )  
JAMES MCARTHUR, )  
 )  
Defendants. )  
\_\_\_\_\_ )

VIDEO DEPOSITION OF  
VINCENT CAMARDA  
VIA VIDEOCONFERENCE  
Friday, March 31, 2023

Reported by:  
Brigitte Rothstein, Stenographer  
JOB NO. 230331BGR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JAMES MCARTHUR, )  
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Defendants. )  
\_\_\_\_\_ )

Video deposition of VINCENT CAMARDA taken on  
behalf of the Plaintiff, via videoconference,  
beginning at 10:08 a.m. and ending at 2:18 p.m., on  
Friday, March 31, 2023, before Brigitte Rothstein,  
Stenographer Court Reporter.

10:13 1 Q In what year did you form A.G. Morgan?

10:13 2 A I don't remember.

10:13 3 Q And have you been a principal of A.G.  
10:13 4 Morgan since it was formed?

10:13 5 A Yes.

10:13 6 Q What's your current title there?

10:13 7 A CEO.

10:13 8 Q Has that always been your title?

10:13 9 A Yes, it has.

10:13 10 Q At a certain point, did you solicit

10:14 11 individuals to invest money in connection with a

10:14 12 company called Complete Business Solutions, Inc., which

10:14 13 does business as Par Funding?

10:14 14 A Through A.G. Morgan I and A.G. Morgan II,  
10:14 15 yes -- or AGM I and AGM II.

10:14 16 Q Did you ever solicit any investor to  
10:14 17 contribute funds toward Par Funding outside of AGM I  
10:14 18 and II?

10:14 19 A No.

10:14 20 Q You never had a finder's agreement with  
10:14 21 Par Funding?

10:14 22 A No.

10:14 23 Q A.G. Morgan never did, either?

10:14 24 A No.

10:14 25 Q You never signed a finding agreement with

10:14 1 Par Funding on behalf of A.G. Morgan?

10:14 2 A No.

10:14 3 Q Did Par Funding ever compensate you for  
10:15 4 soliciting investors in Par Funding's securities  
10:15 5 offering?

10:15 6 A Well, the way it worked was that they paid  
10:15 7 us interest for the clients that invested in AGM I and  
10:15 8 II, and then a portion of that interest came to us.

10:15 9 Q So is the answer to the question yes?

10:15 10 A I believe I'm answering you correctly.

10:15 11 Q Could you please answer the question. Is  
10:15 12 the answer to the question, yes, that Par Funding did  
10:15 13 compensate you for soliciting investors?

10:15 14 A I don't feel like that is what I'm saying  
10:15 15 to you.

10:15 16 Q Okay.

10:15 17 A What I'm saying to you is that we had  
10:16 18 notes with Par Funding. They paid us interest. The  
10:16 19 lion share of the interest went to the clients. A  
10:16 20 smaller portion went to us to operate the company, and  
10:16 21 we received some compensation after expenses on that.

10:16 22 Q The difference between what Par Funding  
10:16 23 paid to you and your entity under the promissory note  
10:16 24 issued by Par Funding and the amount that you paid to  
10:16 25 investors in the AGM Funds, I'll refer to that as the

